

**FILED**

UNITED STATES DISTRICT COURT  
LAS CRUCES, NEW MEXICO

MAR 11 2024

MITCHELL R. ELFERS  
CLERK OF COURT

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

T.R. (Teah Ronga),

Plaintiff,

v.

Civ. No. 20-cv-276 GBW/JHR

PATRICK HOWARD,

Defendant.

*Redacted*  
SPECIAL VERDICT FORM

On the questions submitted, the jury finds as follows:

**Question No. 1:** In accordance with the compensatory damages instructions given by the Court, we find the total amount of damages caused by Defendant Howard's violations of Plaintiff Ronga's constitutional rights to be:

\$ 11 million.

*If your answer is greater than \$0, proceed to answer Question 2 on the next page.*

*If your answer is \$0, do not answer any more questions and have your foreperson sign on the last page of this Special Verdict form. This is your verdict and you will all return to open Court.*

**Question No. 2:** Do you find, by a preponderance of the evidence, that the conduct of Defendant Howard that caused injury or damage to Plaintiff was maliciously, or wantonly, or oppressively done?

Yes   X   No           

*If you answered "No" - do not answer any more questions and have your foreperson sign on the last page of this Special Verdict form. This is your verdict and you will all return to open Court.*

*If you answered "Yes" - proceed to answer Question 2A.*

**Question 2A:** In your discretion, are punitive damages appropriate in this case?

Yes   X   No           

*If you answered "No" - do not answer any more questions and have your foreperson sign on the last page of this Special Verdict form. This is your verdict and you will all return to open Court.*

*If you answered "Yes" - proceed to answer Question 2B.*

**Question 2B:** In accordance with the punitive damage instructions given by the Court, we find the total amount of punitive damages that should be awarded against Defendant Howard to be:

\$ 33 Million

The answers herein constitute the jury's unanimous verdict.

  
Foreperson

March 11, 2024  
Date